

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MALEEHA AHMAD )  
 )  
and )  
 )  
ALISON DREITH, )  
 )  
*on behalf of themselves and a class of* )  
*similarly situated individuals,* )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
CITY OF ST. LOUIS, MISSOURI, )  
 )  
Defendant. )

## **DECLARATION OF IRIS MACLEAN**

I, Iris Maclean, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.

2. I live in the area of Washington Avenue and Thirteenth Street in St. Louis, Missouri, with my husband, Alex Nelson.

3. On September 17, 2017, my husband and I were in the area of Locust Street and Tucker Boulevard, where we were observing a group of protesters.

4. I was not participating in the protest and was in the area because that is where my husband and I live. We were observing the protesters while standing on a public sidewalk.

5. The protests were related to the public outrage over the acquittal of Jason Stockley, a former St. Louis police officer who shot and killed Anthony Smith in 2011.

6. I heard the police order the protesters to go either west on Locust or north on Tucker. While I was not actively protesting and did not believe that the order applied to me, I still obeyed and began walking with my husband north on Tucker Boulevard as that was the direction of my home. When we reached Washington Avenue, we turned west to walk to our home which is located on Washington Avenue.

7. At all times while I was walking in the area, I was complying with the law.

8. While on the corner of Washington Avenue and Tucker Boulevard, I never heard any police warnings and there was no order to disperse.

9. When my husband and I were approximately eighty feet from our house, we were suddenly, and without warning, surrounded by a group of police in riot gear.

10. I did not observe anyone in the area breaking the law.

11. My husband and I were then surrounded on all four sides and forced onto the ground.

12. The police then began to use pepper spray indiscriminately on everyone in the now surrounded crowd of people.

13. I was pepper sprayed and suffered pain and burning to my face, hands, and arms. I temporarily lost sight in my right eye and was denied any help to wipe off the pepper spray.

14. In addition to being pepper sprayed, my husband was seriously beaten by the police. I witnessed the beating.

15. I was handcuffed with zip ties and led away from the crowd over to the transport vans. The unknown officer leading me twisted my arms with excessive force even though I was being completely compliant.

16. When I asked what was happening he would not tell me and said he did not care that I live in the area and was not a protester.

17. While waiting to be put in the van I observed many police officers high fiving each other, smoking cigars in celebration, and chanting about their victory.

18. I was arrested, taken to the jail, and put in a cell.

19. I was detained until 9:30 p.m. on September 18, 2017.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 28th day of September, 2017.

By: /s/ Iris Maclean  
Iris Maclean